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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers	))))	CC Docket No. 95-185

To: The Commission

REPLY COMMENTS

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SUMMARY

Arch supports the Commission's efforts to adopt a framework which will ensure compliance with the Commission's policy of reciprocal compensation for interconnection/call termination between local exchange carriers ("LEC") and commercial mobile radio service providers ("CMRS"). Due to the broad cross-section of interests represented by the comments filed in this proceeding, there exists significant polarization of opinions expressed. Arch has selected a limited number of points to address in these Reply Comments.

First, the Communications Act of 1934, as amended, provides the Commission with the authority to adopt the proposals set forth in the Notice of Proposed Rulemaking. Per the Act, states are preempted from regulating CMRS rates charged for traffic termination. Moreover, the Act mandates that the Commission promulgate rules to implement the statutory policy of reciprocal compensation.

Based upon the current competitive environment and the Commission's policy of regulatory parity, any compensation framework adopted must apply to all CMRS providers. Many broadband PCS providers are competing directly with narrowband (e.g., paging) providers by offering narrowband services ancillary to, or in

conjunction with, their broadband operations. A crucial element to a narrowband service provider's ability to compete is the cost of providing service. A compensation mechanism which excludes paging companies from recovering costs necessarily places paging companies at a competitive disadvantage. This result is contrary to the Commission's established policy of regulatory parity among competitive services.

Contrary to the LECs' assertions, it is imperative that the Commission adopt both interim and long term relief measures. Existing interconnection arrangements are inconsistent with the policy of reciprocal compensation. Typically, LECs are compensated based upon a theory of "interconnection to the LEC network" even in instances where traffic originates on the LEC network and is terminated on the CMRS network. Moreover, despite the fact that 100 percent of LEC-paging traffic originates on the LEC network and is terminated on the paging network, paging companies never have been compensated for the costs incurred for call termination. The existing interconnection arrangements are economically unsound and reflect an environment in which LECs have succeeded in exerting significant market power over their CMRS counterparts.

Due to the broad cross section of communications service providers represented by the comments filed in this proceeding, several compensation framework options have been presented for consideration. Arch suggests that the Commission base its interim compensation mechanism on a long-standing LEC component (NYNEX Feature Group 3A) which could be utilized as a surrogate for CMRS costs for call termination. In the long term, Arch suggests that call termination rates be cost based. At the very least, Arch urges the Commission to adopt a policy with respect to the charges assessed for telephone numbers. Arch recommends that the Commission prohibit recurring charges solely for the use of telephone numbers and adopt a maximum monthly charge based upon actual costs.

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REPLY COMMENTS

Arch Communications Group, Inc. ("Arch"), by its attorneys and pursuant to Sections 1.415 and 1.419 of the Commission's Rules,[1/] hereby submits its Reply comments with reference to the above-captioned proceeding. The following is respectfully shown:

I. The FCC Has Jurisdiction to Adopt an Interconnection Framework

1. The commenters split "down party lines" with respect to the jurisdictional issues raised in the Notice of Proposed Rule Making ("NPRM")[2/] and Supplemental Notice of Proposed Rulemaking ("SNPRM")[3/]. Commercial Mobile Radio Service ("CMRS")

1/ 47 C.F.R. §§1.415, 1.419.

2/ Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, Notice of Proposed Rulemaking, CC Docket No. 95-185, released January 11, 1996.

3/ Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers,
(continued...)

carriers support the Commission's efforts to adopt policies to govern interconnection and ensure compensation for services rendered. The Local Exchange Carriers ("LECs") and state commissions, on the other hand, argue that jurisdiction resides with the state commissions.[4/] In order to reach this conclusion, the LECs and state commissions have adopted a strained analysis of Section 332 of the Communications Act of 1934 (the "1934 Act") and Sections 251 and 252 of the Telecommunications Act of 1996 (the "1996 Act").

2. First, the LECs and state commissions argue that Section 332 of the 1934 Act[5/] does not preempt state regulation of interconnection charges affecting CMRS because such charges arise out of their

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[3/] (...continued)
Order and Supplemental Notice of Proposed Rulemaking, CC Docket No. 95-185, released February 16, 1996.

[4/] The support of the LECs for this position reflects the fact that interconnection arrangements reached in state forums typically are favorable to LECs.

[5/] Section 332 of the Communications Act provides:

> Notwithstanding sections 2(b) and 221(b), no State or local government shall have any authority to regulate the entry of or the rates charged by any commercial mobile service or any private mobile service, except that this paragraph shall not prohibit a State from regulating the other terms and conditions of commercial mobile services.... 47 U.S.C. §332(c)(3).

regulation of LECs not the regulation of CMRS providers.[6] This bootstrap argument is not unexpected given the narrow focus that LECs and state commissions historically have brought to interconnection issues, but is still incorrect. The instant proceeding was initiated to implement at long last the Commission's policy of mutual compensation for interconnection. CMRS providers are finally to receive a form of compensation for call termination in order to recover costs incurred in connection with call delivery. Thus, although jurisdiction over one portion of the interconnection formula (the rates charged by LECs to CMRS providers) may reside at least in part in the states, jurisdiction over the other side of that formula (the rates charged by CMRS providers to LECs for call termination) clearly resides with the Commission.

3. Second, the LECs argue that Sections 251 and 252 of the 1996 Act confirm the states' jurisdiction over LEC-CMRS interconnection. Section 252 of the 1996 Act does confer upon the states the duty to approve and arbitrate intrastate

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6/ See Comments of Connecticut Department of Public Utility Control ("CDPUC"), p. 5; Comments of the NYNEX Companies ("NYNEX"), pp. 40-1; Comments of the National Association of Regulatory Utility Commissioners ("NARUC"), p. 9.

interconnection agreements, but those statutory provisions also envision a significant role for the FCC in the establishment of interconnection policies. And, Section 251 of the 1996 Act contains an express mandate to the FCC to "complete all actions necessary to establish regulations to implement the requirements of this section."[7/] One of the requirements contained within Section 251 of the 1996 Act is the obligation to ensure reciprocal compensation for the transport and termination of telecommunications.[8/] Indeed, Section 252 of the 1996 Act, governing states' arbitration of interconnection disputes, requires that state commission decisions "meet the requirements of section 251, including the regulations prescribed by the Commission pursuant to section 251..."[9/] Thus, at the very least, the FCC has the authority to promulgate rules with which state commission decisions must be consistent. Certain LECs acknowledge this, by requesting that the FCC adopt "guidelines" rather than stringent requirements for the states to follow.[10/]

7/ 47 U.S.C. §251(d)(1).

8/ 47 U.S.C. §251(b)(5) (emphasis added).

9/ 47 U.S.C. §252(c)(1).

10/ See e.g., NYNEX Comments, p. 43; Comments of SBC Communications, Inc., p. 23.

4. Both the 1934 Act and the 1996 Act make clear that Congress empowered the FCC to take the forefront in establishing interconnection arrangements and compensation arrangements for call termination. The FCC has the requisite authority to adopt the proposals contained within the NPRM, and any rules promulgated pursuant to Section 251 of the 1996 Act are binding upon the states in their arbitration of interconnection disputes.

II. The Interconnection Compensation Framework Adopted in this Proceeding Should be Applicable to Narrowband CMRS Providers

5. The NPRM asked interested parties to comment on which CMRS providers (e.g., PCS; PCS and cellular; all two-way voice services; or all CMRS providers) should be entitled to compensation for call termination. The record demonstrates that sound economic reasoning, the statutory scheme and public policy require that the compensation frameworks adopted in this proceeding be available for the benefit of all CMRS providers.

6. Pacific Bell ("PacBell") claims that narrowband CMRS ("NCMRS") providers, e.g., providers of paging and narrowband PCS services, should not be entitled to recover costs associated with the

termination of LEC-originated traffic.[11/] PacBell argues that NCMRS providers do not fall within the "mutual" compensation rubric since current traffic flow is virtually all one-way (from the LEC to the NCMRS network). This argument contradicts basic public interest and economic principles. Paging carriers certainly incur costs in connection with call termination. Indeed, since paging companies terminate 100 percent of the traffic flowing between LEC-NCMRS networks, they incur 100 percent of the costs. Current interconnection arrangements -- which deny paging companies any recovery for costs for a service provided to the LEC's customers -- discourage the provision of enhanced call termination or other options related to the service and encourages the use of inefficient call termination offerings.

7. Ironically, the LECs strenuously advocate full cost recovery when opposing the Commission's proposal to adopt a Bill and Keep compensation mechanism as an interim recovery measure for CMRS two-way service providers.[12/] It is completely

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11/ Comments of Pacific Bell, Pacific Bell Mobile Services, and Nevada Bell ("PacBell"), pp. 107-8.

12/ The LECs argue, in general, that approximately 80 percent of LEC-CMRS traffic originates on the CMRS network and terminates on the LEC network. Thus, (continued...)

disingenuous for the LECs to argue against similar compensation to paging carriers. In fact, the LECs' argument that Bill and Keep is unfair because of the imbalance between landline-originated and mobile-originated calls in the CMRS two-way environment should cause them to resoundingly embrace compensation to paging companies who suffer the greatest imbalance of all.[13/]

8. Moreover, Section 332 of the 1934 Act and Section 251 of the 1996 Act do not require traffic to flow in both directions as a prerequisite for compensation for call termination. The 1996 Act requires compensation for the termination of telecommunications, regardless of the existence (or

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[12/](...continued) the LECs claims that a Bill and Keep mechanism would constitute an unjustified subsidy to CMRS providers since LECs terminate more traffic than do CMRS providers. See PacBell Comments, pp. 10, 13 and 25; Comments of Cincinnati Bell Telephone, pp. 1-2; NYNEX Comments, pp. 28-9; SBC Comments, pp. 9-13; Comments of Ameritech, pp. 6-7.

[13/] Unlike the LEC-broadband CMRS scenario described above, where the LEC receives some benefit by having its traffic terminated for free, there is no such similar "offset" with respect to paging traffic. In the LEC-paging traffic flow, the paging company is prohibited from recovering 100 percent of the costs it incurs.

non-existence) of originating traffic.[14] The crucial element in determining eligibility for compensation is whether costs are incurred in connection with communication termination. It is undisputed that paging companies do incur such costs.

9. The Connecticut Department of Public Utility Control ("CDPUC") argues that no CMRS providers, including NCMRS providers, are entitled to compensation for call termination because Connecticut does not have the authority to impose upon them the universal service and carrier of last resort obligations that are imposed on LECs and arguably increase the LECs' costs. Consequently, CDPUC argues, LECs should not be required to compensate CMRS providers whose costs are lower than those of the LECs due to an uneven regulatory scheme.[15] However, adopting mutual compensation arrangements would not preclude the state commission from allowing LECs to recover through tariffs each additional cost associated with their unique universal service regulatory obligations. Consistent with the 1996 Act and previously stated Commission policy, the CDPUC should

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14/ The requirement that compensation be "reciprocal" is satisfied as long as every carrier who terminates traffic is compensated.

15/ CDPUC Comments, pp. 12-3.

mandate mutual compensation notwithstanding any special obligations applicable to a LEC.

10. Other provisions in the 1934 and 1996 Acts support the application of the mutual compensation framework to NCMRS carriers. Section 251 of the 1996 Act requires telecommunications carriers to interconnect with the facilities of other telecommunications carriers and to negotiate in good faith the terms and conditions of agreements relating to reciprocal compensation for termination of telecommunications traffic.[16/] The term "Telecommunications Carrier" is defined as "any provider of telecommunications services...."[17/] The term "Telecommunications Services" is defined as "the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used."[18/] CMRS providers, including NCMRS providers, clearly fall within the category of "telecommunications carriers" and, as such, are entitled to interconnection at

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16/ 47 U.S.C. §§251(a), (b)(5) and (c)(1).

17/ 47 U.S.C. §3(a)(49).

18/ 47 U.S.C. §3(a)(51).

technically feasible points and to compensation for the termination of traffic.

11. Section 332 of the 1934 Act, and Commission policy promoting regulatory parity for substantially similar services,[19] require that NCMRS licensees be provided the same opportunity to recover costs associated with call termination as are their competitors, LECS and other CMRS carriers. PacBell claims that NCMRS providers do not compete with broadband CMRS providers and LECs providing two-way local loop service. To the contrary, NCMRS providers are in competition more and more each day with their broadband CMRS counterparts. Many broadband CMRS licensees are providing one way messaging service ancillary to or together with their broadband offerings, in direct competition with NCMRS providers. Moreover, some landline service providers also are offering paging-like services, in direct competition with paging companies. Finally, the Commission recently initiated a proceeding to evaluate the extent of fixed local loop services CMRS providers, including NCMRS providers, should be permitted to offer in competition with LECs.

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[19] 47 U.S.C. §332; Implementation of Sections 3(n) and 332 of the Communications Act; Regulatory Treatment of Mobile Services, Second Report and Order, 9 FCC Rcd. 1409 (1994).

12. In its Regulatory Treatment of Mobile Services docket,[20] the Commission held that services which are substantially similar and compete for subscribers -- as in the case of paging carriers, other CMRS carriers and LECs -- should be subject to similar regulatory obligations and frameworks so that no class of competitor would be placed at a competitive advantage vis-a-vis the other carriers. To that end, based upon the direct competition between paging providers and other CMRS providers and LECs, any compensation mechanism offered to broadband CMRS providers must also be offered to NCMRS providers. Should the Commission adopt a compensation mechanism solely with respect to broadband CMRS, thereby reducing those carriers' cost of providing service to subscribers, paging companies would be precluded from competing effectively with respect to price and services offered.

III. Interim and Long Term Solutions are Necessary

13. Despite LECs' claims to the contrary, both interim and long term relief are necessary. The LECs claim that CMRS providers have sufficient power to negotiate favorable interconnection agreements, are

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[20] Implementation of Sections 3(n) and 332 of the Communications Act: Regulatory Treatment of Mobile Services, Second Report and Order, 9 FCC Rcd. 1409 (1994).

satisfied with existing interconnection arrangements and that the current interconnection arrangements have not hindered the strong growth of the CMRS industry.[21/] The Comments filed in this proceeding provide evidence to the contrary.[22/] The current negotiation process has resulted in an environment in which every carrier, regardless of traffic direction or responsibility for call delivery and/or termination, is considered to be "interconnected to" the LEC network and is required to pay for such "interconnection." Such is the case even in situations where calls are originated by LEC subscribers and terminated by a NCMRS provider (pursuant to the NCMRS carrier's provision of access to its network for termination of the call). This concept defies logic -- LECs are being compensated even in instances where the NCMRS provider is offering access to its network. The current status of interconnection arrangements clearly is inconsistent with the Commission's policy of mutual compensation, and is proof that nothing short of a federally-mandated

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21/ See CBT Comments, pp. 2-4; NYNEX Comments, pp. 13, 21-3; SBC Comments, pp. 13-4; Ameritech Comments, pp. 3-4, 6-7.

22/ See Comments of Paging Network, Inc., pp. 3-4, 22-3; Comments of the Personal Communications Industry Association, pp. 6-7.

framework will ensure compliance with the heretofore ignored policy.

14. PacBell argues that CMRS carriers need not be compensated for call termination because they are compensated by their customers through the assessment of charges for both call origination and termination.[23/] This statement is untrue with respect to paging carriers. Although cellular carriers may assess usage charges for both incoming and outgoing calls, paging companies assess a flat rate, not dependant upon call direction or minutes of use. Thus, the recovery of call termination costs incurred by paging companies would come solely from charges to LECs based upon the number and duration of LEC-originated calls delivered to the NCMRS network for switching and termination.

15. Several LECs argue that interconnection charges are such a small percentage of CMRS (cellular) carriers' retail prices that there is no need for interim relief.[24/] Again, this claim has no merit in

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23/ PacBell Comments, pp. 29, 72.

24/ PacBell Comments, p. 29; CBT Comments, p. 6 n. 10 (estimates interconnection charges are 5% of retail price of cellular in CBT territory); Comments of the United States Telephone Association, p. __ (interconnection is not a significant component in the cost structure of (continued...)

the paging industry, where interconnection costs comprise a significant portion of carriers' costs. The paging industry is by far the most competitive segment of the wireless marketplace. Paging carriers also compete with other market segments such as cellular, SMR, and broadband PCS, where service providers package their own paging services with their wireless two-way voice and data products. A paging carrier's success depends heavily on its ability to provide reliable, low cost service. Industry statistics indicate the average monthly revenue per paging unit was approximately $9.69 in 1995 and the monthly operating cost per subscriber was approximately $7.34.[25/] These operating costs generally include billing costs, fixed allocation costs, paging equipment allocation costs, customer service costs, selling costs, telephone interconnection costs and other operating costs. The telephone interconnection costs often include charges for Type 1

[24/] (...continued)
CMRS); Comments of GTE Service Corporation, p. 38 (interconnection charges are less than 10% of rate CMRS providers charge their customers); and Comments of U S West, Inc., p. 19 (given the fact that U S West's interconnection charges represent less than 3% of CMRS revenues there is absolutely no basis for the assertion that LECs have the ability to "control the fate" of the CMRS industry).

[25/] Lehman Brothers, U.S. paging Industry Monthly Monitor, January 1996.

numbers and land-to-mobile usage in addition to interconnection facility charges. Consequently, the costs associated with interconnection have a significant impact upon a paging company's competitive position and cannot be dismissed by the LECs as insignificant or unworthy of reduction or recovery.

16. Finally, LECs oppose an interim compensation mechanism for CMRS providers claiming that regulatory constraints on pricing prevent them from responding promptly to recover the revenues they will lose as a result of the transition to a Bill and Keep mechanism or other arrangement pursuant to which CMRS providers are compensated for call termination services rendered. However, some of the revenues LECs have been receiving from past interconnection arrangements are in fact windfalls. Especially in the case of paging companies, where the paging company incurs the cost of call termination for 100 percent of the LEC-NCMRS traffic, the LECs have no right to those monies collected pursuant to existing interconnection arrangements. The Commission must not perpetuate this unfairness, even if it were true that it would take the LECs time to adjust. Moreover, Arch does not accept the contention that it is impossible for LECs to change rates in a timely fashion, due to tariff, notice and

billing system constraints. As competition has been introduced to the local loop many state commissions have streamlined their tariff requirements to better enable carriers to respond quickly to changes in market forces. Although LECs remain subject to additional pricing burdens which are not imposed upon CMRS providers, LECs certainly should be capable of responding to changed revenue within a reasonable time.

IV. Suggested Compensation Mechanisms

17. In its Comments, Arch supported the Commission's tentative conclusion that the costs of dedicated facilities used to transport LEC-originated traffic from the LEC's network to the CMRS provider's network be recovered on a non-traffic sensitive basis and suggested that the costs of those facilities be borne by the LEC.[26/] Further, Arch agreed with the Commission that compensation for call termination, in the long term, should be cost-based.[27/]

18. With respect to interim solutions, and since historical cost data has not been compiled for purposes of call termination compensation, Arch suggested that the Commission adopt an interim recovery mechanism based upon a long-utilized LEC charge

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26/ Comments of Arch Communications Group, Inc. ("Arch"), pp. 9-10.

27/ Id., p. 10.

component, Feature Group 3A, offered by NYNEX.[28/] Arch opposed the application of the Bill and Keep mechanism to NCMRS as being economically unsound and contrary to the public interest.[29/]

19. Finally, Arch requested that the Commission adopt guidelines with respect to the rates charged for telephone numbers.[30/] Specifically, Arch requested that the Commission prohibit the assessment of recurring monthly charges for telephone numbers or, in the alternative, place a limit on the charges assessed,[31/] and ferret out and eliminate discrimination in charges assessed for telephone numbers.

20. There are many proposals on the table for interim relief. In addition, there is no consensus among the commenting parties with respect to the effect of the 1996 Act on the Commission's jurisdiction and the adequacy of existing compensation arrangements. Consequently, the Commission may find it difficult to

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28/ Id., pp. 12-3.

29/ Id., pp. 11-2.

30/ Id., p. 15.

31/ Arch proposes that monthly recurring charges for Type I numbers should be based on cost, not to exceed $0.10 per 100 number group. Arch believes the monthly cost for a group of 100 numbers is less than a penny.

adopt any interim relief prior to the August 8, 1996 deadline for implementation of Section 251 of the 1996 Act. At the very least, Arch suggests that the Commission level the competitive playing field by: (1) eliminating the discrimination existing in interconnection arrangements and (2) requiring LECs to comply with the Commission's prohibition on recurring charges, solely for the use telephone numbers.

21. LECs have a bottleneck monopoly on numbers, and use this leverage to extract unjust and unreasonable fees from CMRS providers. Since filing its Comments, Arch has learned that Century Telephone in Ohio charges $103.60 for a block of 100 numbers (i.e., $1.04 per number). Arch estimates that, on a per number basis, Ameritech charges $0.08, SBC charges $0.085, Bell Atlantic charges $0.14, U S West charges $0.15, Sprint Mid-Atlantic charges $0.24, SNET charges $0.52, and GTE's charges may be as high as $1.00.[32/] And, CMRS providers are required to pay for numbers

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32/ GTE also provides paging interconnection service from its Local End User's Tariff. In Texas, for instance, the monthly charge for a block of 50 telephone numbers is $50.00. Many paging carriers pay these high rates because they are unaware of lower rates available in GTE's "Paging National Agreements" (see, Comments of GTE Service Corp., at Attachment A, page 5) or to avoid the imposition of the discriminatory, paging only, "Switched Termination" charge (Id. Attachment A, page 41).

whether they are in service or not. For instance, it is reasonable to assume that 15-20% of a paging company's numbers could be unassigned, at any give time, due to churn and shelf inventory (i.e., 9% for churn, based on a 3% per month ratio).[33/] Relief is justified, and any steps the Commission can take in this proceeding to regularize the costs of telephone numbers would be appreciated.

22. Arch demonstrates with the two examples below how interconnection charges to paging companies can be much more significant than the LECs would have the Commission believe:

<u>Example I:</u> <u>Two Foreign Served DID Trunks and 400 Numbers Provided by GTE from its Local Exchange Tariff in Texas</u>

Facility Charges:	$404.00
400 Numbers:	$<u>150.00</u>
Total Telco Charges:	$554.00

Total Telco Charges divided by assumed telephone numbers in service equals Telco Charge per paging subscriber (i.e., $554/328=$1.69). Telephone interconnection charges in this example would be about 23 percent of the average Operating Cost Per Subscriber (i.e., $1.69/$7.34=23%). Approximately forty-six cents, or 27%, of the interconnection charges were for telephone numbers. Telephone interconnection charges

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[33/] Goldman Sachs, <u>Paging Industry Outlook</u>, September 18, 1995.

in this example are approximately 17 percent of the average revenue per subscriber (i.e., $1.69/9.69=17%).

Example II: Sixteen Locally Served DID Trunks and 6300 Numbers Provided by SNET from its Connecticut Wireless Interconnection Tariff

Facility Charges:	$ 360.80
Type I Land-to-Mobile Usage	$3,000.00
6300 Numbers	$3,276.00
Total Telco Charges	$6,636.80

Total Telco Charges divided by assumed telephone numbers in service equals Telco Charge per paging subscriber (i.e., $6,636.80/5166=$1.28). Telephone interconnection charges in this example are about 17 percent of the average Operating Cost Per Subscriber (i.e., $1.28/$7.34=17%). Sixty-three cents, or almost half, of the interconnection charges were for telephone numbers. Telephone interconnection charges in this example are approximately 13 percent of the average revenue per subscriber (i.e., $1.28/9.69=13%). It is no wonder that "most LECs want to interconnect with CMRS providers. CMRS providers are important customers and most LECs want to keep this business on their facilities..."[34/]

23. In addition to the monopoly-level charges extracted from paging providers in return for telephone numbers, LECs frequently discriminate against paging

[34/] GTE Comments, p. 41.